

The Honorable Brian D. Lynch  
Hearing Date: June 10, 2015  
Hearing Time: 9:00 a.m.  
Response Date: June 3, 2015  
Chapter 7  
Location: Tacoma

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re:

No. 15-40334

DICKSON MANG JR.,

MOTION FOR SALE OF PROPERTY FREE  
AND CLEAR OF LIENS

## Debtor.

COMES NOW the Trustee, Kathryn A. Ellis, and moves the Court for an order permitting sale of the real property located at 5419 Courtney St SE, Olympia, WA, free and clear of all liens, for the sum of \$225,000.00 to Manpreet Gill, and/or assigns, or to the individual(s) making the highest and best offer to the estate at or before the hearing on this Motion.

The Trustee also seeks authority to pay the first position Deed of Trust of Wells Fargo Bank NA, and/or assigns, in the amount of approximately \$182,500.00, or such sum as may be negotiated or adjusted to accomplish a sale, in full satisfaction of its lien against this property after all costs of closing, including real estate commissions, property taxes, excise taxes, and other closing costs, together with a carveout to the estate in the amount of \$20,000.

Said sale to Manpreet Gill, and/or assigns, will be free and clear of all liens and interests, said  
liens and interests to attach to the proceeds of the sale as though those proceeds were the property.  
Notwithstanding the foregoing, the Trustee requests the authority to pay the above named secured creditor  
in the approximate amount stated.

DATED this 8<sup>th</sup> day of May, 2015.

/s/ Kathryn A. Ellis  
Kathryn A. Ellis, Trustee

C:\Shared\KAE\Dox\TRUSTEE\Mang\sale\_mot.wpd

KATHRYN A. ELLIS, ESQ.  
600 Stewart St  
Suite 1300  
Seattle, WA 98101  
(206) 682-5002

**MOTION FOR SALE OF PROPERTY FREE AND CLEAR OF LIENS - 1**